

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: DARRELL G. SCHABOWSKY : CASE NO.: 1:14-bk-01944 HWV
CHRISTINE E. SCHABOWSKY :
Debtor :

DEBTORS' MOTION TO REOPEN BANKRUPTCY CASE

AND NOW COMES, Darrell G. Schabowsky and Christine E. Schabowsky Debtors, by and through his attorneys, Jacobson, Julius & Harshberger who hereby files this *Motion to Reopen Case* pursuant to 11 U.S.C. § 350 to accord relief to said Debtors, and in support thereof Debtors state as follows:

1. Debtors filed a Chapter 13 Bankruptcy case on April 25, 2014.
2. Debtors failed to timely provide counsel with his Certificate of Debtor Education or Certification Regarding Domestic Support obligations as they were taken and filed after the case was closed without a discharge.
3. Debtors Bankruptcy case was closed without discharge on August 15, 2019.
4. Debtors failed to follow Counsel and the bankruptcy courts notices to complete the required courses timely. However, they were completed after the case was closed and uploaded to docket entries 41, 42 and 43.
5. Debtors seek to reopen this Chapter 13 case so that this Honorable Court can accept the filing of the documents and obtain a discharge.

WHEREFORE, the Debtors respectfully requests that this Honorable Court reopen their Chapter 13 bankruptcy case and accept the filing of his *Certificate of Debtor Education* and *Domestic Support Certifications*.

Respectfully Submitted,

JACOBSON, JULIUS & HARSHBERGER

Dated: June 8, 2020

s/Chad J. Julius
Chad J. Julius
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CERTIFICATE OF SERVICE

AND NOW, this 8th day of June, 2020, I, Colleen Reed, legal assistant at Jacobson, Julius & Harshberger, attorneys for the Debtor, hereby certify that on this day I served *Debtor's Motion to Reopen Case* upon the following persons via the ECF/CM system:

Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the U.S. Trustee
228 Walnut Street Suite 1190
Harrisburg, PA 17101

Dated: June 8, 2020

s/Colleen Reed
Colleen Reed, Legal Assistant

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ORDER

Upon consideration of Debtors' Motion to Reopen their bankruptcy case, it is hereby ORDERED that the Debtors' *Motion to Reopen Case* is GRANTED and the Debtors are permitted to file the *Certificate of Debtor Education and Certification Regarding Domestic Support* to obtain a discharge.